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February 20, 2012

Ms. Marlene H. Dortch, Commission Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

Filed Electronically Via ECFS

RE: Gazelle Link, LLC
Customer Proprietary Network Information Certification
EB Docket No. 06-36

Dear Ms. Dortch:

Gazelle Link, LLC, by its undersigned attorneys, hereby submits its 2011 CPNI Compliance Certificate and Accompanying Statement certifying compliance with Section 64.2001 *et seq.* of the Commission's rules.

Please contact the undersigned should you have any questions or concerns at (269) 381-8893 extension 226 or patrick@crockerlawfirm.com.

Very truly yours,

CROCKER & CROCKER

Patrick D. Crocker

PDC/crg

Enclosures

cc: Best Copy and Print, Inc. (via e-mail FCC@BCPIWEB.COM)

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011

Date filed: February 15, 2012

Name of Company Covered by this Certification: Gazelle Link, LLC

Form 499 Filer ID: 826154

Name of Signatory: Johnny Brown

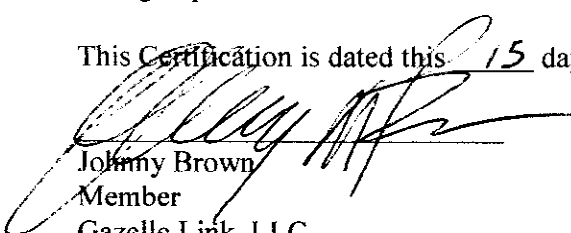
Title of Signatory: CEO

I am the CEO of Gazelle Link, LLC and as such do hereby certify, affirm, depose, and say that I have authority to make this Customer Proprietary Network Information ("CPNI") Annual Certification of Compliance on behalf of Gazelle Link, LLC. I have personal knowledge that Gazelle Link, LLC has established adequate operating procedures to ensure compliance with the Commission's CPNI rules as set forth in 47 C.F.R. § 64.2001 et. seq.

Attached to this Certification is an Accompanying Statement explaining how the company's procedures ensure compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Gazelle Link, LLC received no customer complaints in the past year concerning the unauthorized release of CPNI. Further, Gazelle Link, LLC has taken no action against data brokers for the unauthorized release of CPNI during calendar year 2011. Gazelle Link, LLC will report any information it may obtain with respect to the processes pretexters are using to attempt to access CPNI and what steps Gazelle Link, LLC is taking to protect CPNI.

This Certification is dated this 15 day of February, 2012.



Johnny Brown
Member
Gazelle Link, LLC

Customer Proprietary Network Information Certification Accompanying Statement

Gazelle Link, LLC has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, ("section 222") and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in sections 64.2001 – 64.2011 of the Commission's rules. This attachment summarizes those practices and procedures, which have been updated so that they are adequate to ensure compliance with the Commission's CPNI rules.

Gazelle Link, LLC provides private telecommunications services over dedicated lines to large enterprise and carrier customers pursuant to ICB contracts. Gazelle Link, LLC's customer contracts uniformly contain confidentiality agreements that address customers' private information. It is Gazelle Link, LLC's policy not to disclose CPNI except as specifically set out in its contracts with its customers and where required by law.

Safeguarding against pretexting

- Gazelle Link, LLC takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. Gazelle Link, LLC is committed to notify the FCC of any novel or new methods of pretexting it discovers and of any actions it takes against pretexters and data brokers.

Training and discipline

- Gazelle Link, LLC has an express disciplinary process in place for violation of the Gazelle Link, LLC's CPNI practices and procedures. Gazelle Link, LLC employees are required to review and abide by Gazelle Link, LLC's Code of Conduct, which, prohibits all employees from using customer information other than for providing service to the customer or as required to be disclosed by law.

Gazelle Link, LLC's use of CPNI

- Gazelle Link, LLC uses CPNI for the following purposes:
 - (1) To initiate, render, maintain, repair, bill and collect for services
 - (2) To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;
 - (3) For network maintenance; and
 - (4) As required by law.

- Gazelle Link, LLC does not distribute CPNI to third parties for their sales or marketing purposes. Nor does Gazelle Link, LLC share, sell, lease or otherwise provide CPNI to any of its affiliates, suppliers, vendors, or any other third party for the purpose of marketing any service.
- Gazelle Link, LLC does not share, sell, lease or otherwise provide CPNI to any third party except pursuant to appropriate non-disclosure agreements. Gazelle Link, LLC will not otherwise disclose CPNI to a third party except when required by a lawfully issued government subpoena.

Additional safeguards

- Gazelle Link, LLC does not use CPNI for marketing purposes and therefore does not have records to maintain regarding marketing campaigns that use its customers' CPNI.
- Gazelle Link, LLC has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules.
- Gazelle Link, LLC designates one or more officers, as an agent or agents of the Gazelle Link, LLC, to sign and file a CPNI compliance certificate on an annual basis. The certificate conforms to the requirements set forth in FCC rule 64.2009(e).
- Gazelle Link, LLC does not disclose CPNI over the phone and does not allow for online access to CPNI.
- In the event of a breach of CPNI, Gazelle Link, LLC will comply with all applicable breach notification laws.

STATEMENT OF ACTIONS TAKEN AGAINST DATA BROKERS

- A. During Calendar Year 2011, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the Federal Communications Commission:

NONE

- B. During Calendar Year 2011, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the various Public Utilities Commissions:

NONE

- C. During Calendar Year 2011, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the following federal or state courts:

NONE

**SUMMARY OF CUSTOMER COMPLAINTS
REGARDING UNAUTHORIZED RELEASE OF CPNI**

- A. During Calendar Year 2011, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper access by Company employees:

NONE

- B. During Calendar Year 2011, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper disclosure to individuals not authorized to receive the information:

NONE

- C. During Calendar Year 2011, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper access to online information by individuals not authorized to view the information:

NONE

- D. During Calendar Year 2011, the Company has become aware of the following processes that pretexters are using to attempt to access its CPNI:

NONE